

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtors.<sup>1</sup>

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

**Re: ECF No. 1545**

**INFORMATIVE MOTION IN RESPONSE TO ORDER REGARDING THE LOCATION  
AND PROCEDURES FOR ATTENDANCE, PARTICIPATION AND OBSERVATION  
OF THE NOVEMBER 15–16, 2017 OMNIBUS HEARING**

To the Honorable United States District Judge Laura Taylor Swain:

The Puerto Rico Fiscal Agency and Financial Advisory Authority (“AAFAF”) through their undersigned counsel, hereby states and prays as follows.

1. The undersigned, appearing in this proceeding on behalf of AAFAF, hereby respectfully submit this Informative Motion in response to the Court’s order entered on October 26, 2017 [ECF No. 1545].

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<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); and (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747). (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

2. The following counsel intend to appear in person and speak at the November 15–16, 2017 Omnibus Hearing (the “Omnibus Hearing”) in the New York courtroom on behalf of AAFAF, to present the perspective of the Government of Puerto Rico, on the following matters:

- a. Elizabeth Lemond McKeen of O’Melveny & Myers LLP:
  - i. Pre-Trial Conference in *Asociacion de Salud Primaria de Puerto Rico et al., v. Commonwealth of Puerto Rico, et al.* [Case No. 17-227, ECF No. 23].
  - ii. *Urgent Motion of Financial Guaranty Insurance Company Regarding Proposed 90-Day Stay of All Litigation to Facilitate the Recovery from Hurricanes Irma and Maria* [Case No. 17-3283, ECF No. 1514].
  - iii. *Motion of National Public Finance Guarantee Corporation (“National”) for Entry of an Order Pursuant to Bankruptcy Rule 2004 Authorizing Discovery* [Case No. 17-3283, ECF No. 1177] (the “National Motion”).
  - iv. *Joint Motion by the Ad Hoc Group of General Obligation Bondholders* (the “Ad Hoc Group”), *Assured Guaranty Corp., Assured Guaranty Municipal Corp., and the Mutual Fund Group* (together with the Ad Hoc Group, the “GO Group”) *for Order Authorizing Rule 2004 Examination* [Case No. 17-3283, ECF No. 1178] (the “GO Motion”).

v. *Ambac Assurance Corporation's ("Ambac") Motion for Entry of Order Authorizing Discovery Under Bankruptcy Rule 2004* [Case No. 17-3283, ECF No. 1283] (the "Ambac Motion").

vi. *ERS Secured Creditors Joinder to Rule 2004 Motions* [Case No. 17-3283, ECF No. 1340].

b. William Sushon of O'Melveny & Myers LLP

i. *Motion of Official Committee of Unsecured Creditors for Order, Under Bankruptcy Rule 2004, Authorizing Discovery Program With Respect to Certain Causes of Puerto Rico Financial Crisis* [Case No. 17-3283, ECF No. 706]

c. Diana Perez of O'Melveny & Myers LLP

i. *Rexach Hermanos, Inc.'s Motion for Modification of the Automatic Stay* [Case No. 17-3567, Dkt. No. 770].

3. Nathan A. Haynes, David Cleary and Joseph P. Davis III of Greenberg Traurig LLP also intend to appear and seek to be heard on behalf of AAFAF as needed as it relates to matters involving PREPA.

4. Counsel in San Juan, Andrés W. López, will make every effort to appear at the Omnibus Hearing in the San Juan courtroom but does not seek to be heard.

Dated: November 8, 2017  
San Juan, Puerto Rico

Respectfully submitted,

/s/ Elizabeth Lemond McKeen

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*[Signature Block Continued on Next Page]*

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